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April 24, 1997

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By Hand Delivery

William F. Caton  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

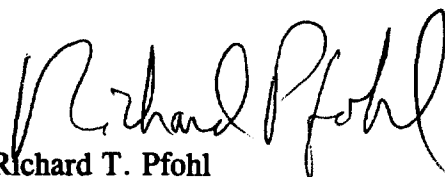
Federal Communications Commission  
Office of Secretary

Re: GTE Service Corporation  
Reply Comments of GTE  
Supporting Affidavit of H. Lee Jones  
CC Docket No. 96-263

Dear Mr. Caton:

Attached herewith are an original and twelve copies for filing of the affidavit of H. Lee Jones, a faxed copy of which was filed yesterday with the Reply Comments of GTE Corporation in the above captioned docket. Also included with the affidavit are Charts 3 and 4, which were inadvertently omitted from the copy of the affidavit as filed yesterday. If you have any questions, please contact the undersigned.

Respectfully submitted,

  
Richard T. Pfohl

Enclosures

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**AFFIDAVIT OF H. LEE JONES**

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STATE OF TEXAS

COUNTY OF DALLAS

**APR 24 1997**

Federal Communications Commission  
Office of Secretary

I, H. Lee Jones, being duly sworn state as follows regarding Supervision and Coordination of the Internet Service Provider Terminating call study:

1. I am Group Product Manager-Network Access Services, Carrier Markets Product Management, for GTE Telephone Operations. My principal duties and responsibilities are the management of products and services sold to the Internet Service Provider wholesale market segment. I coordinated and supervised the Signaling System 7 (SS7) link study outlined below.
2. Earlier this year, GTE commissioned a study that monitored SS7 traffic. With this study capability GTE can specifically identify Internet traffic on its interoffice trunk network. The study gave GTE the ability to study local exchange (non-toll) calling on a call detail basis similar to toll calling detail without the rating or billing data. The study recorded the "from" and "to" telephone numbers from the initial address message created for SS7 routing and call control processes. The study also monitored all calls for holding time. Normally, such information is not recorded.
3. For this study, equipment polled the SS7 Signal Control Point for all calls to a group of end offices in the Tampa, Florida, metropolitan region in which Internet Service Providers (ISPs) were served. Over the seven day period of the study, 7.3 million calls were polled. The study package stored these records for further inquiry such as sorting calls between ISPs and other calls.

GTE Service Corporation  
April 23, 1997

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4. The study recorded all interoffice terminating traffic to Tampa Main, Tampa East and Ybor City offices. The recorded traffic included the terminating local calling, the terminating 1+ seven digit terminating toll as well as the terminating 1+ ten digit interLATA access traffic to IXC points of presence served by these three offices. Thus, the study shows the total terminating interoffice trunk capacities utilized in one week for a major metropolitan area. By collecting "to" telephone numbers, the study distinguished ISP from non-ISP traffic. Although the study focused on traffic in the Tampa metropolitan region, the study could be replicated in any region served by GTE.
5. The conclusions of this study are threefold:
  - a. The Internet access usage on the interoffice terminating trunk load during the business day (8:00 A.M. to 5:00 P.M.) busy hour (3:00 P.M. to 4:00 P.M.) was approximately one-third of the total terminating trunk usage. See Chart #1 where hour 15-16 (3:00 P.M. to 4:00 P.M.) showed 750,000 CCS (Centum Call Seconds - a unit of 100 seconds of PSTN usage) for non-ISP and 350,000 CCS for ISP. The total of 1.1 million (750,000+350,000) CCS was the design parameter used for sizing the interoffice terminating trunk capacity. Thus, the ISP calls were almost one-third of the facility requirements.
  - b. The holding time for ISP calls was approximately 22 minutes in the 15-16 busy hour; non-ISP calls in that hour, approximately 2.5 minutes. Thus, each ISP call contributed on average nearly nine times as much usage as non-ISP calls to total network usage.
  - c. The call volume of ISP traffic at the busy hour is represented on Chart #2. This data shows 4.3% of the call volume as ISP. Despite the relatively low volume of ISP calls, as Chart #1 demonstrates, due to the relatively long holding time of

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ISP calls, ISP calls constituted approximately one-third of terminating trunk capacity. This demonstrates relatively small call volumes with long holding times can yield a substantial level terminating trunk capacity in the busy hour.

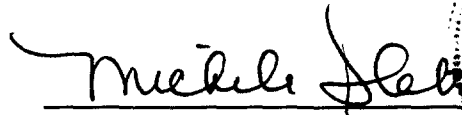
In the study volume of 89,000 daily busy hour calls, the four percent (4%) of calls (approximately 4,000) making up the internet access calls had an identifiable terminating interoffice trunk requirement of approximately 1,800 trunks. If the internet access calls had had a holding time of 2.57 (the time of non-ISP) minutes, the identifiable terminating trunk requirement would have been 200 trunks. Thus, 1,600 trunks is the additional requirement attributable to the net increase in holding time for the internet access calls. As mentioned previously, the busy hour proportion of terminating interoffice trunk quantities consumed by internet access usage was approximately one-third of total terminating trunks.

This study, to the best of my ability and judgment, clearly shows that Internet access call characteristics such as holding time and call volume create additional interoffice terminating trunk requirements for additions to the public switched network.



H. Lee Jones, Affiant

Subscribed and sworn to before me on this 23rd day of April 1997.



Michele Slaboda, Notary Public  
Commission Expires: 06/09/98  
County of Dallas, State of Texas

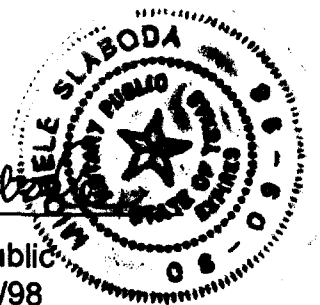


Chart 1

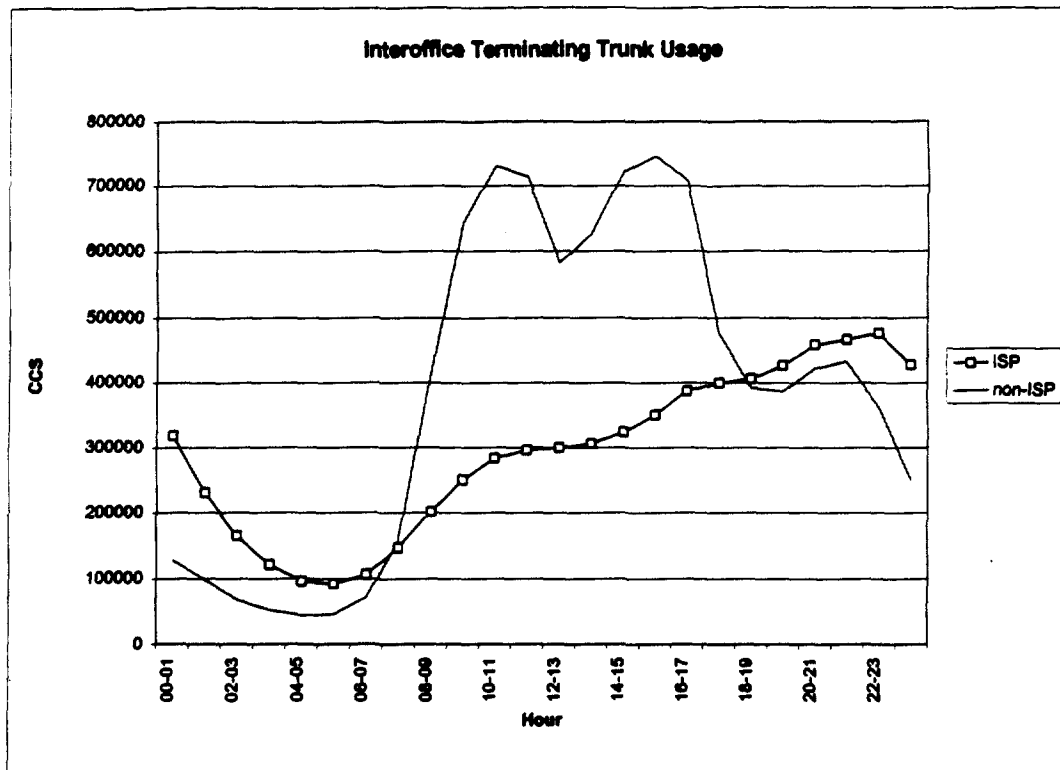


Chart 2

**COMPLETED CALLS AND AVERAGE HOLDING TIME PER CALL  
FOR FIVE WEEKDAYS STUDIED  
ISP TRAFFIC vs NON-ISP TRAFFIC**

<b>HOUR</b>	<b>ISP COMPLETED</b>	<b>NON-ISP COMPLETED</b>	<b>ISP HOLDING TIME</b>	<b>NON-ISP HOLDING TIME</b>
00-01	1660	10158	25.01	2.76
01-02	876	8358	27.81	1.96
02-03	528	7784	30.00	1.47
03-04	359	7497	42.14	1.26
04-05	341	7440	27.24	1.16
05-06	595	8554	28.91	1.09
06-07	1183	12591	21.26	1.70
07-08	2003	24849	21.66	2.45
08-09	2659	56047	21.79	2.68
09-10	2738	76963	22.55	2.62
10-11	2772	82506	22.45	2.65
11-12	2792	81427	22.20	2.52
12-13	3121	68977	21.39	2.33
13-14	2915	73934	19.03	2.52
14-15	3147	81457	19.92	2.60
15-16	3865	84898	22.04	2.57
16-17	4670	80574	24.11	2.54
17-18	4625	52498	25.89	2.44
18-19	4680	39171	23.57	2.70
19-20	4590	33015	23.53	3.09
20-21	5244	31180	27.35	3.52
21-22	6264	26684	31.50	4.10
22-23	4695	20586	22.89	4.23
23-24	3133	14463	22.24	3.68

Total calls studied are shown in the table below:

**Chart 3**

**TOTAL CALLS STUDIED**

	MON.	TUE.	WED.	THUR.	FRI.	TOTAL
<b>NON-ISP ATTS.</b>	1,408,725	1,448,822	1,415,840	1,346,840	1,219,484	6,839,522
<b>NON-ISP COMPS.</b>	1,020,662	999,749	979,444	988,130	970,080	4,958,065
<b>ISP ATTS</b>	127,290	127,290	105,687	79,548	63,453	503,268
<b>ISP COMPS.</b>	77,895	72,621	74,820	64,053	57,891	347,280

The following table depicts the total calls studied during the five week days. This shows the overall average holding time of both the ISP calls and the non-ISP calls. Calls that were not completed includes calls that were not completed regardless of the reason, *i.e.*, ring-no-answer, busy, etc.

**Chart 4**

	Complete d Calls	Duration in Minutes	Average Holding Time in Minutes	Non- Complete d Calls	Percent Complete d Calls	Percent of Total Traffic
<b>ISP Traffic</b>	347,280	8,629,908	24.85	155,988	69.00%	40.75%
<b>Non-ISP Traffic</b>	4,958,065	12,543,904	2.53	1,881,457	72.50%	59.25%
<b>Total Traffic</b>	5,305,345	21,173,812	3.99	2,037,445	72.25%	100%

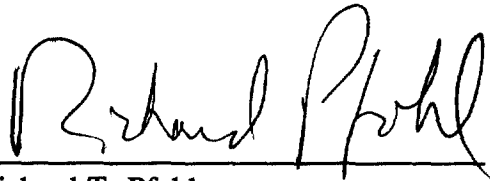
In this study, as reflected in Chart 4, non-completed calls include "ring-no-answer" calls, "line-busy" calls, calls abandoned by a customer post-dial, as well as blocked calls.

**CERTIFICATE OF SERVICE**

I, Richard T. Pfohl, hereby certify that on this 24th day of April, 1997, I caused true copies of the foregoing to be hand delivered to the following persons:

\* Competitive Pricing Division  
Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W., Room 518  
Washington, D.C. 20554

International Transcription Service  
2100 M Street, N.W.  
Room 140  
Washington, D.C. 20554

A handwritten signature in dark ink, appearing to read "Richard Pfohl", written over a horizontal line.

Richard T. Pfohl

\* Two copies delivered.